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June 15, 2020

VIA ECF

The Honorable Robert B. Kugler
U.S. District Court for the District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Street, Courtroom 4D
Camden, New Jersey 08101

**Re: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation,
Civil Action No. 1:19-MD-02875 – Request for Intradistrict Transfer of
Certain Cases**

Dear Judge Kugler:

We represent Zhejiang Huahai Pharmaceutical Co., Ltd., Princeton Pharmaceutical Inc., Solco Healthcare U.S., LLC, and Huahai U.S., Inc. (together, the “ZHP Defendants”), defendants in many of the actions centralized before you in the above-captioned MDL. We write to notify you of several related actions that are currently pending against our clients before other judges in the District of New Jersey. Rule 7.2(a) of the Rules of the Judicial Panel on Multidistrict Litigation requires us to seek reassignment of these actions in the District Court, rather than through the JPML.

In its Transfer Order [ECF 1], the JPML concluded that all “putative consumer class actions seeking economic damages” and all “related personal injury actions alleging that plaintiffs developed cancer as a result of using valsartan containing NDMA or NDEA impurities” should be centralized. [ECF 1 at 3] The attached Schedule of Actions identifies certain Valsartan actions that fall within the scope of the Transfer Order and that are currently pending in the District of New Jersey. We respectfully request that these actions be reassigned to you as part of the Valsartan, Losartan, and Irbesartan Products Liability Litigation MDL.

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For the Court's convenience, I have attached a proposed form of Order for the Court's consideration, and thank you for your courtesies with regard to this request.

Respectfully,

/s/ Seth A. Goldberg
Seth A. Goldberg

DUANE MORRIS LLP

SAG
Attachments